

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SYRACUSE MOUNTAINS  
CORPORATION,

Plaintiff,

v.

PETRÓLEOS DE VENEZUELA S.A.,

Defendant.

Civil Action No. 1:21-cv-02684-VEC

**NOTICE OF DEFENDANT'S MOTION  
FOR ISSUANCE OF LETTERS OF  
REQUEST**

**PLEASE TAKE NOTICE** that upon the accompanying Memorandum in Support of Defendant's Motion for Issuance of Letters of Request, and all proceedings and pleadings in this action, defendant Petróleos de Venezuela, S.A., by and through undersigned counsel, will move this Court, the United States District Court for the Southern District of New York, at the courthouse thereof, located at 40 Foley Square, New York, New York 10007, before the Honorable Valerie E. Caproni, for: issuance of letters of request for international judicial assistance from the appropriate judicial authorities of China, Dominica, Luxembourg, Portugal, and the United Kingdom, pursuant to 28 U.S.C. § 1781 and Chapter I of the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, T.I.A.S. No. 7444, 23 U.S.T. 2555, in the form annexed hereto as Exhibits 1–7, to obtain discovery from the non-party foreign entities Banque Internationale à Luxembourg, S.A.; The Bank of New York Depositary (Nominees) Ltd.; The Bank of New York Mellon SA/NV, Luxembourg Branch; China CITIC Bank; Dinosaur Merchant Bank Ltd.; Novo Banco, S.A.; and Zuma Bank Corporation; and such other and further relief as the Court deems just and proper.

Dated: January 18, 2022

Respectfully submitted,

HOGAN LOVELLS US, L.L.P.

By: /s/ Dennis H. Tracey

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